



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

AUG 12 2016

**CERTIFIED MAIL NO.: 7009 1680 0000 7677 9531**

**RETURN RECEIPT REQUESTED**

Ms. Debra A. Rupp  
Controller  
DS Manufacturing  
67 Fifth Street, N. E.  
Pine Island, Minnesota 55963

Re: Notice of Violation  
Compliance Evaluation Inspection  
EPA I.D. No.: MND062835376

Dear Ms. Rupp:

On June 15, 2016, a representative of the U.S. Environmental Protection Agency inspected DS Manufacturing located in Pine Island, Minnesota (DSM or the facility). As a large quantity generator (LQGs), DSM is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 *et seq.* (RCRA). The purpose of the inspection was to evaluate DSM's compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by DSM, EPA's review of records pertaining to the DSM facility, and the observations of the inspector, EPA has determined that DSM has unlawfully stored hazardous waste without a permit or interim status at the DSM facility because DSM failed to comply with certain conditions for a RCRA permit exemption under Minn. R. 7045.0292, Subpart 1 and 40 C.F.R. § 262.34(a)-(c). See paragraphs 1 through 9 below.

Many of the conditions for a RCRA permit exemption are also independent requirements that apply to permitted and interim status hazardous waste management facilities that treat, store, or dispose of hazardous waste (TSD requirements). See Minn. R. 7045.0292, Subpart 1, 7045.0552 *et seq.* and 40 C.F.R. Part 265.

When a hazardous waste generator loses its RCRA permit exemption status because it failed to comply with conditions for a RCRA permit exemption pursuant to Minn. R. 7045.0292, Subpart 1 and 40 C.F.R. § 262.34(a)-(c), the generator: (a) becomes an operator of a hazardous waste storage facility; and (b) simultaneously must comply with the TSD requirements at Minn. R. 7045.0552 *et al.* and 40 C.F.R. Part 265.

Based on the information provided by DSM, EPA's review of records pertaining to the DSM facility, and the observations of the EPA inspector, EPA has determined that in addition to violating Minn. R. 7045.0292, Subpart 1 and 40 C.F.R. § 262.34(a)-(c), DSM has also violated Minn. R. 7045.0552 *et seq* and 40 C.F.R. Part 265. See paragraphs 1 through 9 below.

#### **STORAGE OF HAZARDOUS WASTE WITHOUT A PERMIT OR INTERIM STATUS**

At the time of the inspection, DSM failed to comply with the following large quantity generator permit exemption conditions and independent TSD requirements.

##### **Use and Management of Containers**

1. Under Minn. R. 7045.0292 and 7045.0626 [40 C.F.R. §§ 262.34(c)(1)(i) and 265.173(a)], a large quantity generator using a container to store hazardous waste must ensure that the container is closed during storage, except when it is necessary to add or remove waste. The lid, cap, hinge or closure device must be of sufficient strength and construction that when closed, the container will fully contain the hazardous waste. At the time of the inspection, DSM had not kept closed one (1) hazardous waste satellite accumulation container of F006.

##### **Preparedness and Prevention**

2. Under Minn. R. 7045.0292 and 7045.0568 [40 C.F.R. §§ 262.34(a)(4) and 265.37], a large quantity generator must make arrangements with local authorities including the fire departments, police departments, emergency response teams and local hospitals, as appropriate, for the type of waste handled at the facility and the potential need for their services. At the time of the inspection, DSM had not made arrangements with all the local authorities.

##### **Contingency Plan**

3. Under Minn. R. 7045.0292 and R. 7045.0572 Subpart 4 (D) [40 CFR §§ 262.34(a)(4) and 265.52 (d)], a large quantity generator must have a contingency plan for the facility that lists names, addresses and phone numbers (office and home) of all persons qualified to act as emergency coordinator. At the time of the inspection DSM had not listed the home addresses of the emergency coordinator and the alternate emergency coordinator.

4. Under Minn. R. 7045.0292 and R. 7045.0572 Subpart 4 (F) [40 CFR §§ 262.34(a)(4) and 265.52 (d)], a large quantity generator must include an evacuation plan in the Contingency Plan that includes signals used to begin evacuation, and specify the primary and alternate evacuation routes. At the time of the inspection DSM had not included an evacuation plan in the Contingency Plan that included signals used to begin evacuation, and specified the primary and alternate evacuation routes.

5. Under Minn. R. 7045.0292 and R. 7045.0572 Subpart 5 (B) [40 CFR §§ 262.34(a)(4) and 265.53 (b)], a large quantity generator must submit a copy of the contingency plan to all local police departments, fire departments, hospitals, and state and local emergency response teams that may be called upon to provide emergency services. At the time of the inspection DSM had not submitted a copy of the contingency plan to all local police departments, fire departments, hospitals, and state and local emergency response teams that may be called upon to provide emergency services.

6. Under Minn. R. 7045.0292 and Minn. R. 7045.0558 (6) (A) [40 CFR §§ 262.34(a)(4) and 265.16 (d)(1)], a large quantity generator must maintain training records which include the job title for each position at the facility related to hazardous waste management. At the time of the inspection DSM had not maintained complete training records which included the written job title for each position at the facility related to hazardous waste management.

7. Under Minn. R. 7045.0292 and Minn. R. 7045.0558 (6) (B) [40 CFR §§ 262.34(a)(4) and 265.16 (d)(2)], a large quantity generator must maintain training records which include a written job description for each position at the facility related to hazardous waste management. At the time of the inspection DSM had not maintained complete training records which included a written job description for each position at the facility related to hazardous waste management.

8. Under Minn. R. 7045.0292 and Minn. R. 7045.0558 (6) (c) [40 CFR §§ 262.34(a)(4) and 265.16 (d)(3)], a large quantity generator must maintain training records which include a written description of type and amount of training, including initial and continuing, for each position related to hazardous waste management. At the time of the inspection DSM had not maintained complete training records which included a written description of type and amount of training, including initial and continuing, for each position related to hazardous waste management.

9. Under Minn. R. 7045.0292 and Minn. R. 7045.0558 (6) (d) [40 CFR §§ 262.34(a)(4) and 265.16 (d)(4)], a large quantity generator must maintain training records that document that the required training has been given to and completed by facility personnel. At the time of the inspection DSM had not maintained complete training records which document that the required training has been given to and completed by facility personnel.

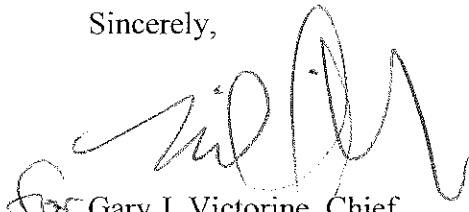
By failing to comply with the conditions for a permit exemption, above, DSM became an operator of a hazardous waste storage facility, and was required to obtain a Minnesota hazardous waste storage permit. DSM failed to apply for such a permit. DSM's failure to apply for and obtain a hazardous waste storage permit violated the requirements of Minn. R. 7001.0500 and 7001.0050 [40 CFR §§ 270.1(c), and 270.10(a) and (d)].

At this time, U.S. EPA is not requiring DSM to apply for a Minnesota hazardous waste storage license so long as it immediately establishes compliance with the conditions for a permit exemption outlined in paragraphs 1 through 9, above.

According to Section 3008(a) of RCRA, EPA may issue an order assessing a civil penalty for any past or current violation, requiring compliance immediately or within a specified time period, or both. Although this letter is not such an order or a request for information under Section 3007 of RCRA, 42 U.S.C. § 6927, we request that you submit a response in writing to us no later than 30 days after receipt of this letter documenting the actions, if any, that you have taken since the inspection to establish compliance with the above conditions and requirements for the DSM facility. You should submit your response to Diane M. Sharrow, EPA, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

If you have any questions regarding this letter, please contact Ms. Sharrow, of my staff, at 312.886.6199 or at [Sharrow.Diane@epa.gov](mailto:Sharrow.Diane@epa.gov).

Sincerely,



for Gary J. Victorine, Chief  
RCRA Branch

Enclosure

cc: John Elling, Minnesota PCA ([john.elling@state.mn.us](mailto:john.elling@state.mn.us))



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 W. JACKSON BOULEVARD  
CHICAGO, IL 60604

COMPLIANCE EVALUATION INSPECTION REPORT

INSTALLATION NAME: DS Manufacturing

EPA ID No.: MND 062 835 376

LOCATION ADDRESS: 67 Fifth Street, S.E., Pine Island, Minnesota 55963

NAICS CODE(S): 332813 Electroplating, Plating, Polishing, Anodizing and Coloring

DATE OF INSPECTION: 15 June 2016

EPA INSPECTOR: Diane M. Sharrow  
Environmental Scientist / Senior Inspector  
Mail Code LR-8J  
Land and Chemicals Division  
RCRA Branch  
Compliance Section 1  
(312) 886-6199 Direct  
(312) 692-2906 Facsimile  
Sharrow.diane@epa.gov

PREPARED BY:

*[Signature]*  
Diane M. Sharrow  
Environmental Scientist / Senior Inspector

*15 July 2016*  
Date

APPROVED BY:

*[Signature]*  
for *[Signature]*  
Michael Cunningham, Chief  
Compliance Section 1  
RCRA Branch

*15 July 2016*  
Date

## INTRODUCTION

### Purpose of Inspection

The purpose of the inspection was to conduct an unannounced Compliance Evaluation Inspection (CEI) at DS Manufacturing (DSM), located at 67 Fifth Street, N.E., Pine Island, Minnesota. The CEI was conducted to evaluate DSM's compliance with provisions of the Resource Conservation and Recovery Act (RCRA), and the state and federal regulations related to the generation, treatment and storage of solid waste, hazardous waste, used oil and universal waste.

### Background

A CEI to evaluate compliance with certain provisions of the RCRA, including those regulations related to the generation, treatment and storage of hazardous waste, was last conducted at DSM by staff of the United States Environmental Protection Agency (EPA) on July 26, 2007. DSM is a small diameter tube fabricator and finisher of small metal parts. DSM has one electric chrome plating line, and was recently purchased by Lincoln Industries of Minnesota, LLC. DSM notified the United States Environmental Protection Agency (EPA) that it was a large quantity generator of hazardous waste on or about August 18, 1980. DSM has operated as both a small quantity generator (SQG) in 1990, 2002, 2010, 2012 and 2014, and as a large quantity generator (LQG) of hazardous waste in all the other years since 1980. DSM is currently operating as a LQG and most recently identified their hazardous waste as F006 (treatment of sediments from nickel and chromium dragout rinses during electroplating) on their Minnesota License Application and Annual Report.

## OPENING CONFERENCE

I arrived at DSM at approximately 8:00 A.M. CST. I parked my vehicle and entered DSM's Lobby where I presented my enforcement credentials to a man standing near the Front Desk and explained that I was present to conduct an unannounced CEI. I asked to speak to Debra Rupp, who had completed the 2015 Annual Report. He left the area to locate Ms. Rupp. A few minutes later Ms. Rupp entered the Front Office area.

When Ms. Rupp arrived, I presented my enforcement credentials. I explained that the purpose of my visit was to conduct an unannounced CEI at DSM. Ms. Rupp identified herself and escorted me to a nearby conference room. She indicated that she was the DSM Controller and had formerly managed Human Resources as well.

I told Ms. Rupp that during the CEI I would complete a review of records and a VSI. I summarized the records that I would review, and provided Ms. Rupp with the U.S. EPA OECA Small Business Information Sheet. I informed Ms. Rupp that DSM could claim any information gathered during the CEI as Confidential Business Information (CBI) including; verbal information, documents and photographs. I told Ms. Rupp that if I needed to take a photograph I would inform her first and she could ensure there was nothing in the photograph that was "confidential" or "protected."

Ms. Rupp left briefly to contact Dean Collier, the Maintenance Manager and returned with some of the records to be reviewed. We were joined shortly thereafter by Mr. Collier. I presented my enforcement credentials to Mr. Collier and explained the purpose of my visit.

Prior to the start of the VSI, I asked Ms. Rupp if DSM could provide me with a copy of a site diagram that I could use during the VSI. Ms. Rupp provided me with a copy of DSM's Emergency Exit Map. I also asked Ms. Rupp to verify that my personal safety equipment (steel-toed boots, hardhat, earplugs, and safety glasses with side shields) was adequate. Ms. Rupp indicated that a hardhat and earplugs were not necessary.

### VISUAL SITE INSPECTION

Ms. Rupp and Mr. Collier escorted me during the VSI as I inspected facility operations. During the VSI I did not observe the entire exterior of the Facility, but Ms. Rupp and Mr. Collier indicated that no industrial activities occur outdoors and there was no storage of any hazardous materials or waste outside the building.

We started the VSI near the Front Office entrance where I noted DSM's license was posted (see Photograph 1). We continued on to an area near the Tool Crib located in the northwest corner of the Press Room. Mr. Collier indicated that DSM stored used oil and related wastes outside the Tool Crib, including Used Floor Dry (see Photographs 2 and 3), Used Oily Water (see Photographs 4 and 5), and Used Oil (see Photograph 7). I noted that the containers were labelled and closed, but asked DSM about the labeling, specifically whether the containers contained used oil and whether each should be labeled with the words "Used Oil." I indicated that the containers being used to store used oil should be labelled in accordance with the Minnesota Pollution Control Agency's (Minnesota PCA) regulations as summarized in their *Used Oil and Related Wastes* guidance (see attached) and should include the words "Used Oil." I also indicated that the label on one container (see Photograph 7) was not clearly legible. Mr. Collier cleaned off the label of one used oil container (see Photograph 7), and marked the words "Used Oil" on the labels of the other containers (see Photographs 5 and 6) in my presence. Mr. Collier and Ms. Rupp also indicated that DSM utilized Lube Tech of St. Paul for the transport and management of DSM's used oil.

We then proceeded to the DSM Parts Washer located in the Bending Area. Mr. Collier indicated the Parts Washer used an aqueous wash and not a solvent based wash. We then went to the Maintenance Office where DSM stores Universal Waste (see Photograph 8). I noted that all the Universal Waste containers were labeled, dated and closed. Mr. Collier indicated that the last shipment of Universal Waste was made using, and went to, the Goodhue County Public Works on May 16, 2016.

At the Maintenance Office I reviewed DSM's Weekly Inspection Reports. I also asked Mr. Collier and Ms. Rupp whether DSM had a sprinkler system and they indicated that DSM did not, but that DSM relied on fire extinguishers that were regularly tested and maintained in-house (see Photograph 9).



Near the Maintenance Area, Mr. Collier and Ms. Rupp also pointed out an area where DSM stores hazardous waste, non-hazardous wastes, materials for recycling, chemical products and obsolete chemicals (see Photographs 10 through 13). I asked Mr. Collier and Ms. Rupp about the chemicals stored in "Obsolete Chemicals," specifically the fiber-drum with an exterior label indicating the material was corrosive. They explained that as DSM identifies chemicals that are no longer needed they are placed on the shelves until waste analysis is made by their Treatment, Storage and Disposal (TSD) facility. I reminded DSM that a hazardous waste determination needs to be made in a timely fashion by the generator and can be made using generator knowledge. I further indicated that if the container did indeed contain a corrosive material that DSM was stating was a waste, the container should be labeled words "Hazardous Waste" and managed as hazardous waste.

DSM escorted me through the Plating Line to the adjacent Wastewater Treatment (WWT) System. DSM indicated that wastewater goes through elementary neutralization before discharging to the local POTW. I noted that the WWT System included a metal finishing clarifier tank and a smaller sludge tank, as well as a sludge drier and filter press (see Photographs 14 through 19). I noted that the clarifier tank and piping, and the sludge tank were labeled as hazardous waste (see Photographs 16 through 19), even though they were part of the WWT System. The label on the waste metal hydroxide sludge tank was faded (see Photograph 19), and Mr. Collier indicated that DSM would replace the label. I also noted one poly tote container that was labeled as F006 (see Photographs 14 and 15) that was labeled and covered. However, I indicated To DSM that the cover (see Photograph 14) was fraying and a gap was developing along the side. Mr. Collier indicated that DSM would obtain a new cover. We then proceeded to small laboratory where DSM collects analytical for the WWT process and the returned to the Front Office area.

During the VSI portion of the CEI, I took nineteen (19) photographs with a Canon Power Shot A2500 digital camera, with 16 megapixel resolution. These 19 photographs are attached to this inspection report and are true and representative of the conditions I observed on the date of the CEI.

## RECORDS REVIEW

During the Records Review I reviewed waste analysis records. I noted that DSM's waste profiles were from Pace Laboratories. I also reviewed DSM's hazardous waste manifests, land disposal restriction notifications (LDRs), paperwork for the shipment of universal waste and used oil, as well as weekly inspection records. During my review of hazardous waste manifests, I noted that DSM's F006 non-hazardous waste nickel filter solids are sent to Agmet in Maple Heights, Ohio (OHR000161299) for use as an ingredient in Agmet's metals recycling process that results in a non-hazardous metal concentrated product. I also noted that Agmet last conducted solid waste testing on DSM's F006 on March 8, 2016; that Debra Rupp signed all of DSM's hazardous waste manifests for the past three years; and that all the LDRs were complete.

During the Records Review I reviewed DSM's license application to the Minnesota PCA (indicating that DSM generates 26,725 pounds annually of F006 from metal hydroxide plating) and Annual Report. I also reviewed DSM's Permit Application Checklist /Application for



Industrial Wastewater, Wastewater Treatment Permit dated April 1, 2016 (for industrial pretreatment prior to discharge to a municipal wastewater treatment facility that requires monthly testing and quarterly reporting), DSM's Air Permit and DSM's industrial storm-water permit.

During my review of DSM's Contingency and Emergency Plan (CEP), I noted that the CEP was prepared by U.S. Compliance on October 19, 2015, but it was not clear that the CEP had been shared with local authorities. I asked Ms. Rupp about this, and she stated that the Fire Department had walked through DSM on May 23, 2016 (which she later documented via electronic mail on June 20, 2016). I also noted that the CEP did not contain an evacuation plan or a map with the location of emergency equipment, and that the "newer" form of the weekly reports in the CEP was not the form being used.

During my review of the CEP, I also noted that the following individuals and "job titles" were identified: Kevin White (Emergency Response), Marty Imhof (Emergency Response), Nate Schlichting (Emergency Response), Dean Collier (Alternate Emergency Response Coordinator) and Debra Rupp (Emergency Response Coordinator), but that the home addresses of the Emergency Coordinator and alternate Emergency Response Coordinator were not specified. I asked Ms. Rupp for DSM's training records and she provided records that the aforementioned individuals had been trained on the CEP and RCRA regulations as well as Duane McGowan and Bill Lindgren. However, during my review I was unable to locate records that included a specific description of what the hazardous waste management job responsibilities and duties were for each of these individuals.

### CLOSING CONFERENCE

At the end of the CEI, Ms. Rupp and I were joined in the conference room by Dennis McShane, Plant Leader. I presented my enforcement credentials to Mr. McShane and explained the purpose of my visit. I then conducted a brief closing conference with Ms. Rupp and Mr. McShane. I explained that I would review my notes, checklist and photographs and make a compliance decision in consultation with my management. I also explained that I would send a letter to DSM, along with the inspection report, checklist and photographs. I then concluded the CEI. I returned to my vehicle and departed DSM at approximately 12:00 P.M.

### Attachment(s)

Inspection Checklist  
*Used Oil and Related Wastes*  
Photographs (19)



67 5th St. NE  
Pine Island MN  
(Goodhue Co.)

# Minnesota Pollution Control Agency

Report Title: Large Quantity Generator (LQG) Compliance Evaluation Inspection Checklist

Preferred ID: MND062835376 Regulated Party: D.S. Manufacturing Inc.

Date: 06-15-2016 Inspector: Diane Sharrow

NAICS 332813 Last Inspected by MPCA 07/26/2007

## G1: Licensing / EPA / Permits

Rule	Requirement	Compliance Status	Remarks
7045.0221	Has Regulated Party obtained a generator identification number?	Yes	MND 062 835 376
7045.1020 A	Metro Area - Does the Regulated Party have an approved license?	N.A.	Not in Metro Area
7045.0225 1	Outstate - Does the site have a current hazardous waste generator license?	Yes	✓
7045.0230 1, B	Outstate - Did the Regulated Party include all hazardous waste streams on its license application?	✓ Apparently	2015-2016
7045.0225 2	Is the Regulated Party's license displayed in a public area at the licensed site?	✓ Yes	Yes - Photo
7001.0520 1, A	Does the Regulated Party operate as a TSD without a permit?	N.A. NO	
MS 116.48 1	Are aboveground tanks >500 G registered with the MPCA? Are underground tanks registered with the MPCA?	✓	NO USTs Wastewater Treatment Tanks in WW Treatment Permit w/ MPCA

## G1: Waste Evaluation

Rule	Requirement	Compliance Status	Remarks
7045.0214 1	Have wastes been evaluated within 60 days of the date they were initially generated?	✓	1 Plating line - electrochrome Foo 6 Analytical by PACE Labs Foo 6 sent to Agmet in Ohio
7045.0294 3	Are test result records of waste analyses kept for 3 years from the last time the waste was sent to a TSDF (on- or off-site)?	✓	Reanalysis via PACE Labs

NAICS - 332813 Electroplating, Plating, Polishing, Anodizing & Coloring  
Not 2 08/18/1980 Sm. Tube / Sm. Diameter Tube Fabrication and

MND 062 835 376

### G1: General Management for Generators

Rule	Requirement	Compliance Status	Remarks
7045.0208 1	Is hazardous waste properly disposed of?	✓	✓ apparently - concern over pending waste determ of "lab pack"
7045.0208 1, E	Does the Regulated Party comply with the POTW requirements for <u>sewered</u> hazardous waste?	N/A	WWT System Permitted by MPCA
7045.0294 5	Are the required records (training, analytical results, inspection reports, license renewal app, exception reports, manifests) located at the licensed site and available for inspection?	✓ Yes - partial	Need to link employees w/ job duties by name to job duties listed in C.P./training.
7045.0568 1	Have emergency response arrangements been made with local authorities and outside providers? (fire, police, local hospital, emergency responders)	✓ Yes - partial	Fire Yes, Emerg. Resp Yes - not clear re: police med. in cont plan but did they coord?
7045.0568 3	Has the Regulated Party documented in its operating record the arrangements made with local emergency authorities?	✓ Yes - partial	See above
7045.0655 3, A	If there is an elementary neutralization unit, a pretreatment unit and/or <u>waste water treatment unit</u> , does the owner or operator conduct timely inspections of the unit(s) for malfunction, deterioration, operator error and discharges?	Yes	alarm system no WWT when not operating
7045.0655 3, B	If there is an elementary neutralization unit, a pretreatment unit and/or <u>waste water treatment unit</u> , does the Regulated Party follow a written inspection schedule for inspection of all monitoring equipment, safety and emergency equipment, security devices and operating and structural equipment?	Yes	
7045.0655 3, E	If there is an elementary neutralization unit, a pretreatment unit and/or <u>waste water treatment unit</u> , are all applicable inspection (and repair) records (logs) kept for at least 3 years and available on-site?	Yes	
7045.0845	Does the Regulated Party properly manage used oil?	Yes	
7045.0895 4	Has used oil accepted from or given to another business to be burned for energy recovery been tested to determine that it is on-specification?	N/A	

**G1: General Management for Generators**

Rule	Requirement	Compliance Status	Remarks
7045.0855 4, C	Does the Regulated Party keep records of every shipment of used oil leaving the generator site for at least three years?	✓	
7045.0805	Does the Regulated Party properly manage used <u>oil-contaminated waste?</u>	<i>only used oil solid waste</i>	
7045.0855 4, C	Does the Regulated Party keep records of every shipment of used oil-contaminated waste leaving the generator site for at least three years?	✓	
7045.0990	Is the Regulated Party properly managing used oil filters?	✓	
7045.0990 3, C, 3	Does the Regulated Party keep records of all used oil filters taken off-site by used oil-filter transporters for at least three years?	✓	

**G1: Preparedness & Prevention**

Rule	Requirement	Compliance Status	Remarks
7045.0566 2	Is hazardous waste managed to prevent or minimize releases?	✓	
7045.0566 3, A	Is a suitable alarm or communication system in place to provide emergency instructions to Regulated Party personnel?	✓	
7045.0566 3, B	Is emergency communication equipment available to summon outside emergency responders?	✓	
✓ 7045.0566 3, C	Is fire control equipment, decontamination equipment, and spill control equipment available?	✓	Place spill kit on emergency exit map & place copy in Cont Plan

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G1: Preparedness & Prevention			
Rule	Requirement	Compliance Status	Remarks
7045.0566 3, D	Is water available in adequate volume for fire control (i.e., firehose, sprinkler system and/or foam equipment) ?	✓	Extinguishers only water in tank
7045.0566 4	Is emergency equipment tested and maintained?	✓	Yes internally & externally w/insp reports
7045.0566 5	Does the Regulated Party provide all personnel involved in hazardous waste being poured, mixed, spread, or otherwise handled with immediate access to an internal alarm or emergency communication device?	✓	PASystem phones radios
7045.0566 6	Is aisle space adequate for emergency operations (like fire fighting, spill cleanup, etc)?	✓	
7060.0600 2	Has the Regulated Party discharged waste or pollutants to the unsaturated zone, through spills, dumping, sewerage or other means?	N/A	Not seen
7045.0275 2	If the Regulated Party had a release to the environment did the Regulated Party immediately notify the agency?	N/A	No release per D. Lippert D. Collier
7045.0275 3	If the Regulated Party has had a release, did the Regulated Party recover as rapidly and as thoroughly as possible, any HW that has leaked, spilled, or otherwise escaped a container?	NA	" "
7045.0855 2, D	Upon detection of a release of <u>used oil</u> to the environment (not originating from a UST) did the Regulated Party stop the release, contain the released used oil, clean up and manage properly the released used oil and other materials contaminated with used oil, and repair or replace any leaking used oil storage equipment prior to returning it to service to prevent future releases?	NA	" "

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### G1: Storage Requirements

Rule	Requirement	Compliance Status	Remarks
7045.0292 1, F	Are hazardous waste containers & tanks properly labeled with the words "Hazardous Waste" and a description that clearly identifies their contents to employees and emergency personnel?	✓	2 tanks part of WWT (clarifier + rectangular tank) labelled → relabel rect. tanks?
7045.0292 1, C	Are hazardous waste containers and tanks labeled with the waste accumulation start date and is it visible for inspection? OR Is the accumulation start date recorded in a clear and legible log for non-shipping containers or tanks?	✓	can barely read (see photo) No date on tanks part of WWT Yes on Cont.
7045.0292 1, A	Has the generator stored HW for more than 90 days beyond the waste accumulation start date?	NONE	1 Cont. F006 in use + dated
7045.0292 1, D	Are hazardous waste storage areas (outdoors) protected from unauthorized access and inadvertent damage from vehicles & equipment?	NA	None Outdoors
7045.0292 1, E	Are hazardous waste containers that hold free liquid placed on an impermeable containment surface? If outdoors, is the surface curbed?	NA	
7045.0626 2, A	Are hazardous waste storage containers in good condition and leakproof?	✓	
7045.0626 2, B	Are there suitable <u>leakproof</u> covers for the hazardous waste containers?	✓	Cover for F006 → frayed (grommets + ropes)
7045.0626 3	Are hazardous waste storage containers compatible with the waste stored in them?	✓	
7045.0626 4	Are hazardous waste storage containers closed? <sup>yes</sup> Are waste containers which can be degraded when exposed to moisture or sunlight covered by an overhead roof or other suitable covering that does not hide the labels? NA	yes but	Cover for F006 → gap in cover
7045.0626 5	Are weekly inspections of hazardous waste containers and their storage areas conducted AND documented?	✓	Switch to New Form that is in C.P.?



MND062835376

### G1: Storage Requirements

Rule	Requirement	Compliance Status	Remarks
7045.0626 6	Are incompatible wastes adequately separated?	✓	
7045.0292 8, B,2	Are satellite accumulation containers properly labeled with "Hazardous Waste" and a clear description of their contents?	<i>Good dated when all started even if not full</i>	No Satellite
7045.0292 8, C,2	For satellite accumulation containers, if located away from the point of generation, are they inspected weekly, and are written records kept?		No Satellite
7045.0292 8, D,1	For satellite accumulation containers, is fill date marked on the containers?		No Satellite
7045.0292 8, D,2	For satellite accumulation containers, are they moved within 3 days of fill date to storage area?		No Satellite
7045.0855 2, C	If used oil is stored, is it stored in containers or tanks that are in good condition, stored on impermeable surfaces, kept closed, and labeled "Used Oil" (including tanks, containers and piping)?	No	Need to label "usedoil"
7045.0855 2, C	Are <u>wastes</u> contaminated with <u>used oil</u> stored in containers or tanks that are in good condition, on impermeable surfaces, closed, and labeled "Used Oil" or "Used Oily Waste"?	Yes	Yes
7045.0990 3, A	If used oil filters are stored, are they stored in containers that are closed, leakproof and labeled "Used Oil Filters"?	Yes	<del>Yes</del> DMS Yes - have filters
273.14 (a)	Are universal waste batteries (each battery), or a battery storage container, labeled with: "Universal Waste-Battery(ies)," or "Waste Battery(ies)," or "Used Battery(ies)"?	None or safe	<del>Yes</del> DMS " "
273.13 (a)	Are universal waste batteries (lead acid, NiCad, etc) that show evidence of leakage, spillage, or damage stored in a closed, structurally sound, compatible container?	None or safe	<del>Yes</del> DMS " "

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### G1: Storage Requirements

Rule	Requirement	Compliance Status	Remarks
273.14 (e)	Are containers of universal waste lamps labeled with: "Universal Waste-Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)"?	YES ✓	see photo
273.13 (d)	Are universal waste lamps stored in closed containers that are structurally sound, adequate to prevent breakage, and compatible? Do containers lack evidence of leakage, spillage, or damage?	YES ✓	see photo
273.13 (c)	Is mercury containing equipment stored in closed containers that are structurally sound, compatible with the contents of the device? Does the container lack evidence of leakage, spillage, or damage?	NA	None on site
273.14 (d)	Is mercury containing equipment (i.e. each device) or a container in which the equipment is contained labeled with: "Universal Waste - Mercury Containing Equipment," "Waste Mercury-Containing Equipment," or "Used Mercury -Containing Equipment"?	NA	None on site

### G1: Manifests

Rule	Requirement	Compliance Status	Remarks
7045.0261 1	Are shipments of hazardous waste made <u>without</u> using a manifest? (exceptions for VSQGs)	NO ✓	
7045.0261 7	Do manifests contain ALL of the following?: Manifest document number, generator data, transporter data, facility data, waste data, required signatures & dates, and a 24 hour emergency number. (document problem manifests in remarks and Description of Violation)	YES ✓	
7045.0265 1, D	Have copies of manifests signed by the generator and transporter been sent to the MPCA within five working days of the initial transporter's acceptance of the waste?	Compliance ✓	
7045.0265 4, A	Have copies of manifests signed by the facility been sent to the MPCA within 40 days of the acceptance of the waste by the facility?	Compliance ✓	

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G1: Manifests			
Rule	Requirement	Compliance Status	Remarks
7045.0298	If applicable, has the generator submitted to the MPCA an exception report for manifest copies not received back from the TSDF within 45 days of the date the waste was initially shipped?	NA	
7045.0294 1	Are signed facility copies of manifests available for review for 3 years from the date material was accepted by the initial transporter?	✓	
7045.0302 1	If Regulated Party exports hazardous waste, are all applicable rules being complied with? (notification, consent, EPA acknowledgement of consent, shipping papers or manifests, etc)	NA	no exports
G1: Land Disposal Restrictions			
Rule	Requirement	Compliance Status	Remarks
268.7 (a), (2)	For waste or contaminated soil that does not meet treatment standards, has the Regulated Party sent a one-time land disposal restriction notification to the receiving treatment or storage facility? Is a copy of the notification available at the Regulated Party's site? Have new notifications been sent when there are changes in waste streams and to any new receiving facilities?	Yes ✓ NA	Agmet
G1: Personnel Training			
Rule	Requirement	Compliance Status	Remarks
7045.0558 1	Have employees that manage hazardous waste completed a hazardous waste training program?	✓	Yes - see training records 7 employees identified
7045.0558 2	Does the Regulated Party have a hazardous waste program director trained in hazardous waste management procedures?	✓	US Compliance Contractor
7045.0558 3	Does the training program include hazardous waste management and emergency response procedures relevant to the positions held by facility personnel?	✓	Insert to personnel files from CP the job duties or identify 7 employees

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### G1: Personnel Training

Rule	Requirement	Compliance Status	Remarks
7045.0558 4	Are new employees trained in hazardous waste management within 6 months of hire or transfer?	✓ yes	
7045.0558 5	Is refresher training regarding the management of hazardous waste provided at least once per calendar year?	✓ yes	
7045.0558 6, A	Does the Regulated Party maintain training records which include a <u>job title for each position at the facility related to hazardous waste?</u>	No	U.S. Compliance inserted job titles in C.P. but need to identify which employee
7045.0558 6, B	Do the records include a job description for each position related to hazardous waste?	<del>yes</del> No	" "
7045.0558 6, C	Is a written description of the type and amount of training (initial & continuing) documented for each position related to hazardous waste?	Yes & NO Annual only	" "
7045.0558 6, D	Has the Regulated Party kept records that document that the <u>initial training</u> and <u>annual review training</u> has been given?	2.	initial training not clear - maybe in personnel files / HK
7045.0558 7	Have training records been maintained for lifetime of facility (or 3 years after an employee leaves.)?	?	Not Clear

### G1: Contingency Plan

Rule	Requirement	Compliance Status	Remarks
7045.0572 2	Does the Regulated Party have a contingency plan?	✓	Yes - Revised 10/19/15 by U.S. Compliance
7045.0574 1	Does the Regulated Party have an Emergency Coordinator on-site or on-call, and does s/he have authority to act (commit resources?)	✓	Yes - D. Rupp

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### G1: Contingency Plan

Rule	Requirement	Compliance Status	Remarks
7045.0572 4, A	Does the contingency plan specify employees' emergency response actions?	✓ yes	
7045.0572 4, C	Does the plan describe arrangements agreed to with local emergency responders?	✓ yes	
7045.0572 4, D	Does the plan include up-to-date <u>name, address and Home and Work phone numbers</u> for emergency coordinators?	✓	No Home Addresses
7045.0572 4, E	Does the contingency plan include an up-to-date emergency equipment list?	✓	Yes
7045.0572 4, F	Is there an evacuation plan for employees that includes signals used to begin evacuation, and primary and alternate evacuation routes?	✓	Yes posted, but copy not in plan
7045.0572 5, A	Is a copy of the contingency plan maintained on-site?	✓	Yes
7045.0572 5, B	Have copies of the contingency plan been submitted to local authorities and emergency response teams?	No?	not clear → Fire Dept may have from visit? missing evacuation plan?
7045.0572 6	Has the contingency plan been amended when necessary? (rule <u>change</u> , emerg <u>eqpt</u> change, process change, emerg. coord. change, plan failed)	✓	



## Used Oil and Related Wastes

### Management guidance for generators

Used oil includes petroleum-based or synthetic-based oils which have been used as lubricants, hydraulic fluids, heat transfer fluids, or for similar uses. Used oil related wastes include any other waste or debris contaminated with used oil. Table 1 lists examples of wastes regulated as used oil in Minnesota.

Table 1: Examples of used oils, related wastes and wastes that are not used oil

Used oil	Used oil related wastes	Wastes that are not used oil
Motor oil	Used oil filters	Fuel oil and other fuels
Transmission fluid	Used floor dry	Crude oil
Hydraulic fluid	Contaminated sawdust	Vegetable oil
Brake fluid	Oily wipes and sorbents	Tallow and animal greases
Compressor oil	Used oil spill debris	Vehicle antifreeze coolant
Refrigerant oil		Fuel tank sludge
Cutting oil		Solvents and oils used as solvent
Quenching oil		Parts washer sludge
Oil-water separator skim		Floor drain sludge
Non-PCB transformer oil		PCB hazardous waste oil
Petroleum-based grease		Mixtures of oil and other wastes

### Environmental concerns

Used oil and related wastes that are improperly managed may release toxic contaminants or heavy metals into the environment. Groundwater and drinking water sources are particularly at risk for pollution from improperly managed used oil. The Minnesota Pollution Control Agency (MPCA) regulates the accumulation, transportation, and disposal of used oil. This fact sheet will discuss the management requirements for generators of used oil and related wastes in Minnesota. The county hazardous waste programs of the Minneapolis-St. Paul metropolitan area (Anoka, Carver, Dakota, Hennepin, Ramsey, Scott, Washington, [Metro Counties]) may have requirements that are more stringent. Contact your Metro County for local requirements.

### Generating and accepting used oil and related wastes

You do not need to obtain a hazardous waste license from the MPCA to generate used oil and related wastes or to voluntarily accept used oil and related wastes from farmers or households. Though you are not required to, the MPCA recommends that you maintain records of the farmers and households from which you accept used oil and related wastes. Requiring farmers and households to identify themselves and keeping a log lowers your risk of receiving contaminated used oil. If you do receive contaminated used oil, you will need the log to apply for reimbursement from the MPCA for cleanup costs. You cannot charge farmers and households if you want to remain eligible for reimbursement of cleanup costs.

You may accept used oil and related wastes from another business so long as you provide the business with a receipt. Do not burn that used oil until it has been tested. See *'Burning used oil at your site'* on page three. You may charge businesses a reasonable fee to accept their used oil and related wastes.

### Storing used oil and related wastes

You may accumulate any amount of used oil and related wastes on your site for an indefinite time as long as you store them properly.

- Accumulate used oil and related wastes only in leak-proof containers or tanks. Containers must be able to fully contain their contents, even if the container is overturned.
- Close the containers at all times except when used oil or related wastes are being added or removed. *Closed* means bungs and caps are fully screwed in or on, open-head containers have lids secured by fully-bolted retaining rings or 'snapped' spring-loaded rings, and bucket snap-lids are fully engaged. If your container has a funnel, it must be screwed into the bung and have a lid that securely latches. Open funnels and lids that shut by gravity alone do not meet these requirements. There are two exceptions:
  - Containers that receive used oil directly from an oil-water separator or oil filter crusher.
  - Containers into which used oil filters are drained (drain filters up to 24 hours).
- Used oil filters may be punctured and crushed on site provided the used oil is recovered. Crushed used oil filters may be recycled as scrap metal; however, you must ensure no used oil is spilled from the crushed filters at your site or in transit. If any used oil is spilled, see the *'Responding to used oil spills'* section on page four of this fact sheet.
- Store containers of used oil and related wastes on a surface reasonably impervious to used oil, such as concrete. Asphalt is generally not considered impervious to used oil. Although there is an exception to this requirement for used oil filter containers, the MPCA recommends that they be stored on the same type of surface as all other used oil and related waste containers.
- Clearly label the containers, aboveground storage tanks (ASTs), and fill pipes for underground storage tanks (USTs) with the words 'Used Oil' or 'Used Oil (type of waste).'
- If storing used oil in tanks, ensure you meet all applicable AST or UST requirements for those tanks.

For more information on AST requirements, see MPCA fact sheet #t-a1-02, [General Requirements for Aboveground Storage Tanks](http://www.pca.state.mn.us/publications/t-a1-02.pdf) at <http://www.pca.state.mn.us/publications/t-a1-02.pdf>.

For more information on UST requirements, see MPCA webpage, [Underground Storage Tank Systems](http://www.pca.state.mn.us/enzq88e) at <http://www.pca.state.mn.us/enzq88e>.

- Ensure that all used oil and related waste storage, both in containers and tanks, meets applicable state and local fire code standards. Contact your local fire marshal for specific requirements.

### Reusing used oil at your site or another site

You may reuse your used oil at your site or another site without approval from the MPCA if you:

- Use it as a lubricant, hydraulic fluid, heat transfer fluid, or for a similar use.
- Use it as a fuel in your own diesel vehicle or equipment.
- Use only the amount of used oil reasonable for the task. A reasonable amount of used oil for a task is no more than the same amount of new oil you would use for the same task.
- Do not process or reclaim the used oil beyond normal filtering.
- Store the used oil according to the directions in this fact sheet.

Do not use used oil to suppress dust on roads. For allowed dust suppressants, see MPCA fact sheet #aq1-15, [Dust Control Treatments for Roads and Surfaces](http://www.pca.state.mn.us/publications/aq1-15.pdf) at <http://www.pca.state.mn.us/publications/aq1-15.pdf>.



## Used oil assumptions and testing

Used oil is considered *off-specification* until it is tested and shown to meet the levels in Table 2. Used oil that meets these requirements is considered *on-specification*. You need only test most used oil once per site, unless your business operations change.

If you generate used oil from electrical transformers or other electrical equipment, or from natural gas pipeline equipment such as scrubbers or drip legs, assume the used oil contains 50 parts per million (ppm) or more polychlorinated biphenyls (PCBs) until you can test it or otherwise document that it contains less than 2 ppm PCBs. Test used oil from electrical and natural gas pipeline equipment each time you drain a piece of equipment. Do not mix the oil from several pieces of equipment and batch test the mixture.

Manage used oil known or assumed to contain 50 ppm or more PCBs as a PCB hazardous waste. For more information regarding PCB hazardous wastes, see MPCA fact sheet #w-hw4-48a, [Identifying and Using PCBs](http://www.pca.state.mn.us/publications/w-hw4-48a.pdf), at <http://www.pca.state.mn.us/publications/w-hw4-48a.pdf>.

## Burning used oil at your site or selling it to another site for burning

If you want to burn used oil you generate or receive from other businesses without any conditions, first test it and document that it meets the used oil specifications in Table 2, then register with the MPCA as a *Used Oil Marketer*. Visit the MPCA at <http://www.pca.state.mn.us/publications/w-hw4-34.pdf> to view fact sheet #w-hw4-34, [Used Oil and Related Wastes: Management Guidance for Marketers](http://www.pca.state.mn.us/publications/w-hw4-34.pdf) for more information. You may sell or give tested on-specification used oil to other businesses for burning only after you register as a used oil marketer.

You may burn untested or off-specification used oil for heat only if you meet these conditions:

- Burn only used oil you generated or received from households and farmers. Do not burn used oil you receive from another business without testing it. However, if your site generates 220 pounds of hazardous waste per month or less, making it a Very Small Quantity Generator (VSQG), and mixes eligible hazardous waste solvents into your used oil under the allowance discussed on page four, you may still burn that mixture.
- Burn in a furnace specifically designed to burn used oil and that is compliant with the Minnesota State Fire Code. Check the manufacturer's specifications. Many fuel oil space heaters sold today are designed to burn used oil.
- Burn in a furnace that is rated at less than 500,000 British Thermal Units (BTUs) per hour and that is vented to the outdoors.
- Operate the furnace in compliance with all state and local fire code requirements. Contact your local fire marshal to determine specific requirements.

Most wood-burning stoves and furnaces are not designed to burn used oil or used oil related wastes. Burning used oil or used oil related wastes in a furnace not designed for such materials is not only prohibited, but will likely void the furnace's warranty.

**Reminder:** Keep records of the amount of used oil you burn on-site under this allowance. You may be required to annually report this amount to the MPCA on your hazardous waste license application.

**Table 2: Used oil specifications**

Criterion	Specification
Flash point	100° Fahrenheit or higher
Arsenic	5 ppm or less
Cadmium	2 ppm or less
Chromium	10 ppm or less
Lead	100 ppm or less
PCBs	2 ppm or less
Halogens	1000 ppm/4000 ppm* maximum

\*Used oil containing more than 1000 ppm total halogens is a fully regulated hazardous waste unless you can document that it does not contain more than 100 ppm of any individual halogen, in which case you may consider it on-specification used oil if it contains less than 4000 ppm total halogens.

## Transporting or shipping used oil from your site

You may transport your own used oil and related wastes in amounts up to 55 gallons, or any amount of used oil filters to:

- another site you own
- another business that has agreed to accept your used oil and will test it before burning it
- a VSQG Collection Program that has agreed to accept your used oil

Ship used oil to any other destination in any amount with a *Used Oil Transporter* registered with the MPCA. Ensure the transporter, receiving business, or collection program provides you with a receipt for the used oil or related wastes. Do not give your used oil to employees to burn at their home.

You may send your oily rags and sorbents to a commercial laundry without using a used oil transporter, or, if your laundry equipment discharges to a publicly owned treatment works (sanitary sewer), you may also launder them on site for reuse. Do not launder them on site if you discharge to a septic system. Only launder them on site if you can safely do so. Under certain conditions, oily rags may spontaneously combust during or even after normal laundering. For more information on managing rags and sorbents, see MPCA fact sheet #w-hw4-61, [Managing Towels, Wipes and Sorbents](http://www.pca.state.mn.us/publications/w-hw4-61.pdf), at <http://www.pca.state.mn.us/publications/w-hw4-61.pdf>.

**Note:** You do not need to establish the thermal value of your used oil-contaminated sorbents, including used floor dry, if you document that they were properly recycled or burned for energy recovery. Do not dispose of used floor dry or similar wastes in your solid waste or on the ground.

## Reporting and recordkeeping for used oil and related wastes

If your site is located outside of the seven metropolitan counties of Anoka, Carver, Dakota, Hennepin, Ramsey, Scott, and Washington, do not report your used oil or related wastes on your annual hazardous waste license application. If your site is located within one of the metropolitan counties listed above, contact your county regulator to find out what you should report.

Keep used oil and related waste shipment receipts for at least three years from the shipment date. Keep testing records for at least three years after you burn, sell, or dispose of your used oil.

## Responding to used oil spills

All used oil spills must be cleaned up immediately. Manage contaminated cleanup materials as a used oil-related waste. Do not apply used oil-contaminated soil or debris to the land. Immediately report all used oil spills of five gallons or more to the Minnesota Duty Officer at 651-649-5451 or 800-422-0798.

## Mixing other wastes with used oil

In general, you are not allowed to mix any other wastes, including waste fuels or paints, with your used oil. Even mixing wastes that are not hazardous wastes, such as contaminated water or used antifreeze, with your used oil may render it difficult to recycle or reuse and significantly increase your disposal cost. There are two exceptions where mixing other wastes with your used oil may be allowed:

**Exception #1:** You may manage used fuel filters from vehicles or fuel distribution or dispensing systems with your used oil filters.

**Exception #2:** If your site generates 220 pounds of hazardous waste per month or less, making it a VSQG, you may mix certain petroleum-based waste solvents into your used oil before burning it on site or shipping it off site as used oil. To do so, you must meet certain conditions.



To mix your waste solvent into your used oil, ensure your VSQG site meets all the following conditions:

- Your waste solvent is:
  - **not** gasoline or a gasoline/solvent mixture
  - **not** contaminated with a chlorinated solvent (such as perchloroethylene, trichloroethylene (TCE), or methylene chloride)
  - **not** a paint-related waste that contains a hazardous metal pigment (such as lead, cadmium, or chromium) above the Toxicity Characteristic Leaching Procedure (TCLP) limits
- The final mixture contains a maximum of 10% solvent waste to 90% used oil.
- Only your own employees mix your waste in your containers or tanks. Transport or disposal vendors may not mix your hazardous waste into used oil on their vehicles or at their site.
- Keep records of each mixing event for at least three years from the mixing date. Count the amount of solvent you mix into your used oil towards your hazardous waste generator size and report it to the MPCA or Metro County.

If you follow all of the above conditions, you do not need to test your waste solvent for its flashpoint or for toxic contaminants.

**Note:** While you may mix non-chlorinated F-listed solvents (such as toluene or methyl ethyl ketone [MEK]) into your used oil under this exception, doing so may make the resulting mixture difficult to recycle or reuse and may significantly increase off-site disposal cost.

## More information

Guidance and requirements in this fact sheet were compiled from Minnesota Rules, Chapter 7045, and Minnesota Statute Chapter 115A, and incorporates regulatory interpretation decisions made by the MPCA on October 11, 2007; April 11, 2008; April 13, 2011; January 9, 2013; and October 8, 2014. To review Minnesota Rules, visit the Office of the Revisor of Statutes at <https://www.revisor.mn.gov/pubs>.

Your metropolitan county and the MPCA have staff available to answer waste management questions. For more information, contact your metropolitan county hazardous waste office or your nearest MPCA regional staff. For information about reducing your generation of used oil and related wastes, contact the Minnesota Technical Assistance Program (MnTAP).

### Metro County Hazardous Waste Offices

Anoka.....	763-422-7093
Carver .....	952-361-1800
Dakota.....	952-891-7557
Hennepin .....	612-348-3777
Ramsey .....	651-266-1199
Scott.....	952-496-8475
Washington.....	651-430-6655
Websites .....	<a href="http://www.co.[county].mn.us">http://www.co.[county].mn.us</a>

### Minnesota Technical Assistance Program

Toll free.....	1-800-247-0015
Metro.....	612-624-1300
Website.....	<a href="http://www.mntap.umn.edu">http://www.mntap.umn.edu</a>

### Small Business Environmental Assistance

Toll free.....	1-800-657-3938
Metro.....	651-282-6143
Website.....	<a href="http://www.pca.state.mn.us/sbeap/">http://www.pca.state.mn.us/sbeap/</a>

### Minnesota Pollution Control Agency

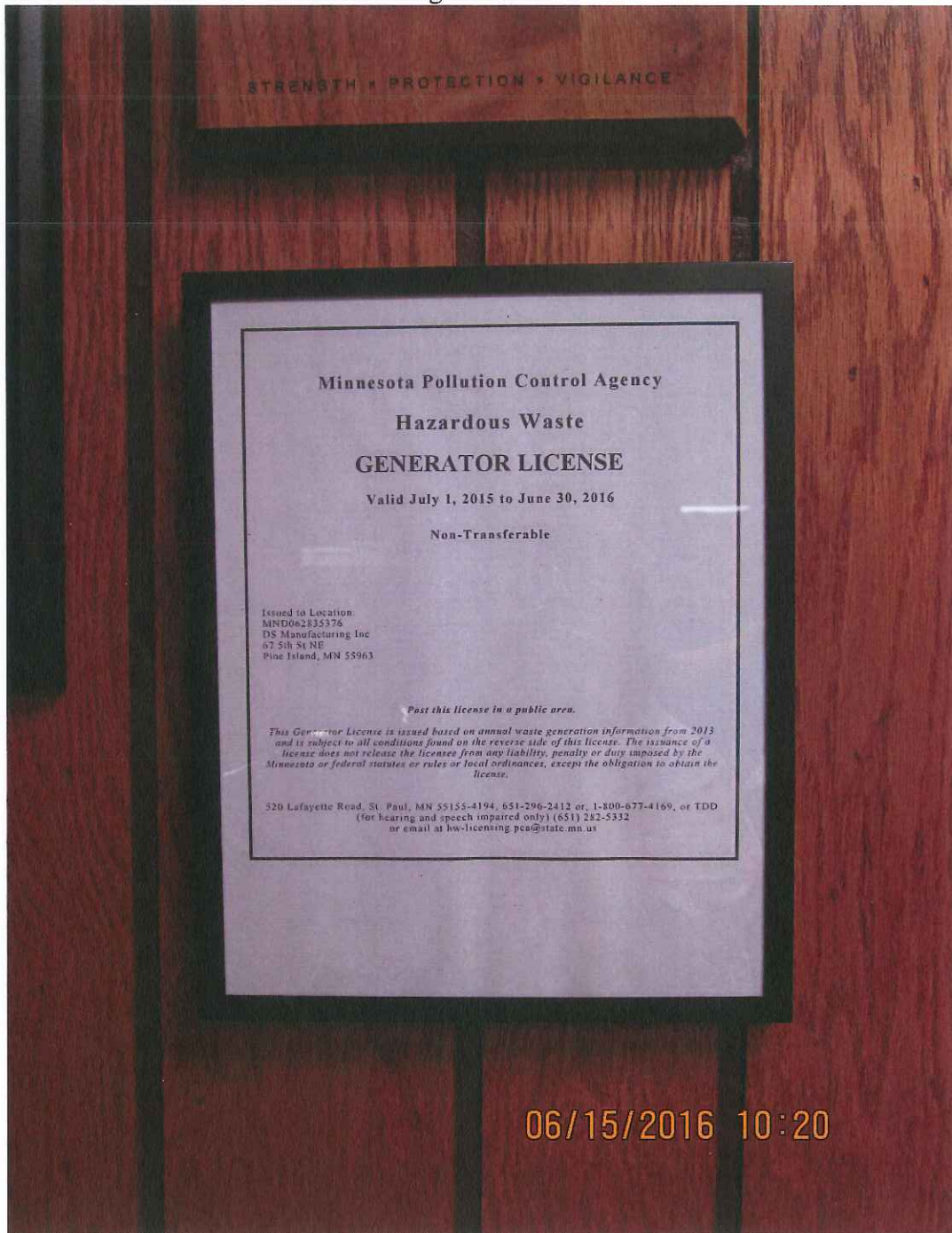
Toll free (all offices).....	1-800-657-3864
Brainerd.....	218-828-2492
Detroit Lakes .....	218-847-1519
Duluth.....	218-723-4660
Mankato .....	507-389-5977
Marshall.....	507-537-7146
Rochester .....	507-285-7343
St. Paul.....	651-296-6300
Willmar .....	320-214-3786
Website .....	<a href="http://www.pca.state.mn.us">http://www.pca.state.mn.us</a>

### Minnesota Duty Officer

Toll free .....	1-800-422-0798
Metro.....	651-649-5451



PHOTOGRAPH 1: DS Manufacturing MND 062 835 376





PHOTOGRAPH 19: DS Manufacturing MND'062 835 376







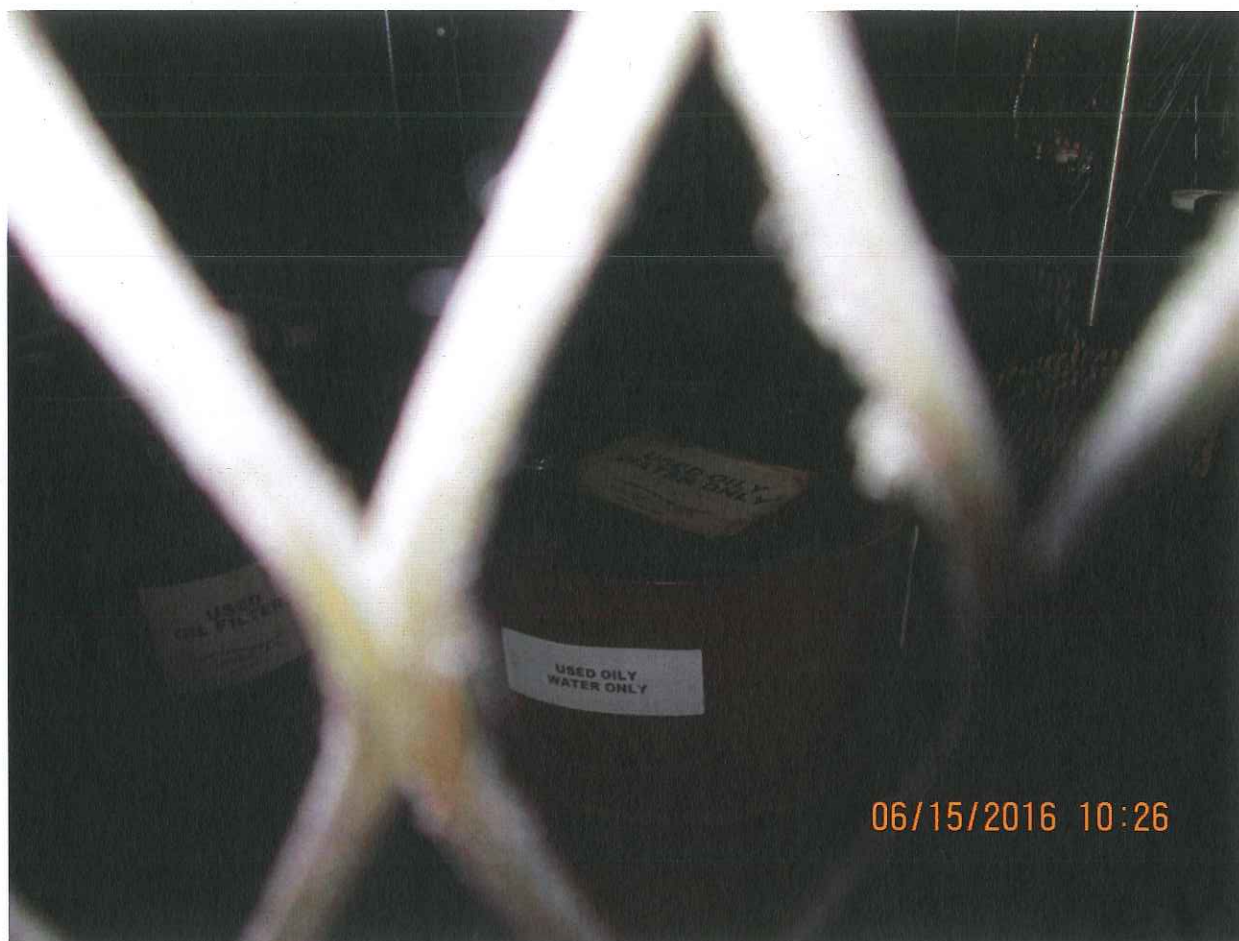
PHOTOGRAPH 19: DS Manufacturing MND 062 835 376





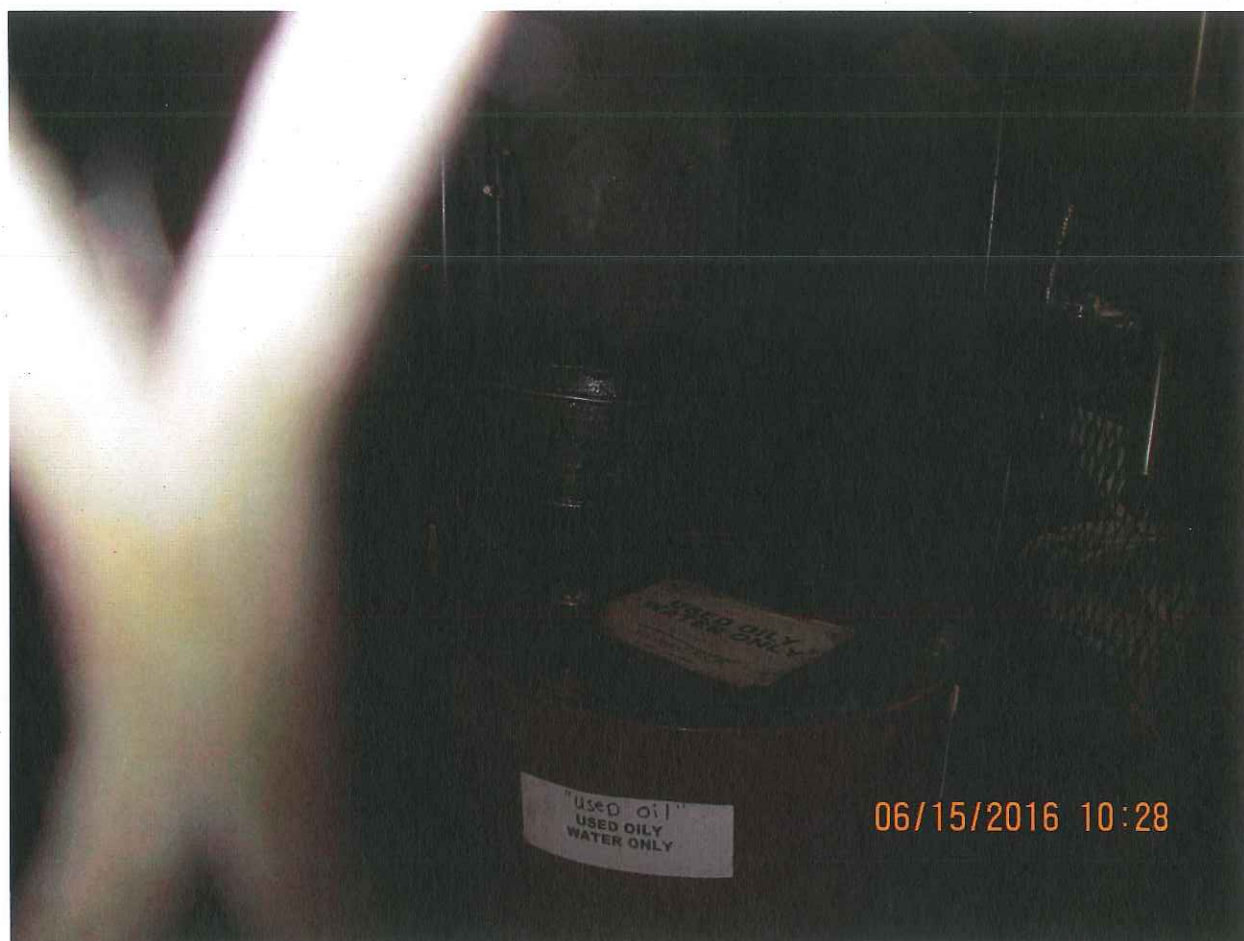


PHOTOGRAPH 19: DS Manufacturing MND 062 835 376





PHOTOGRAPH 19: DS Manufacturing MND 062 835 376





PHOTOGRAPH 19: DS Manufacturing MND 062 835 376







PHOTOGRAPH 19: DS Manufacturing MND 062 835 376



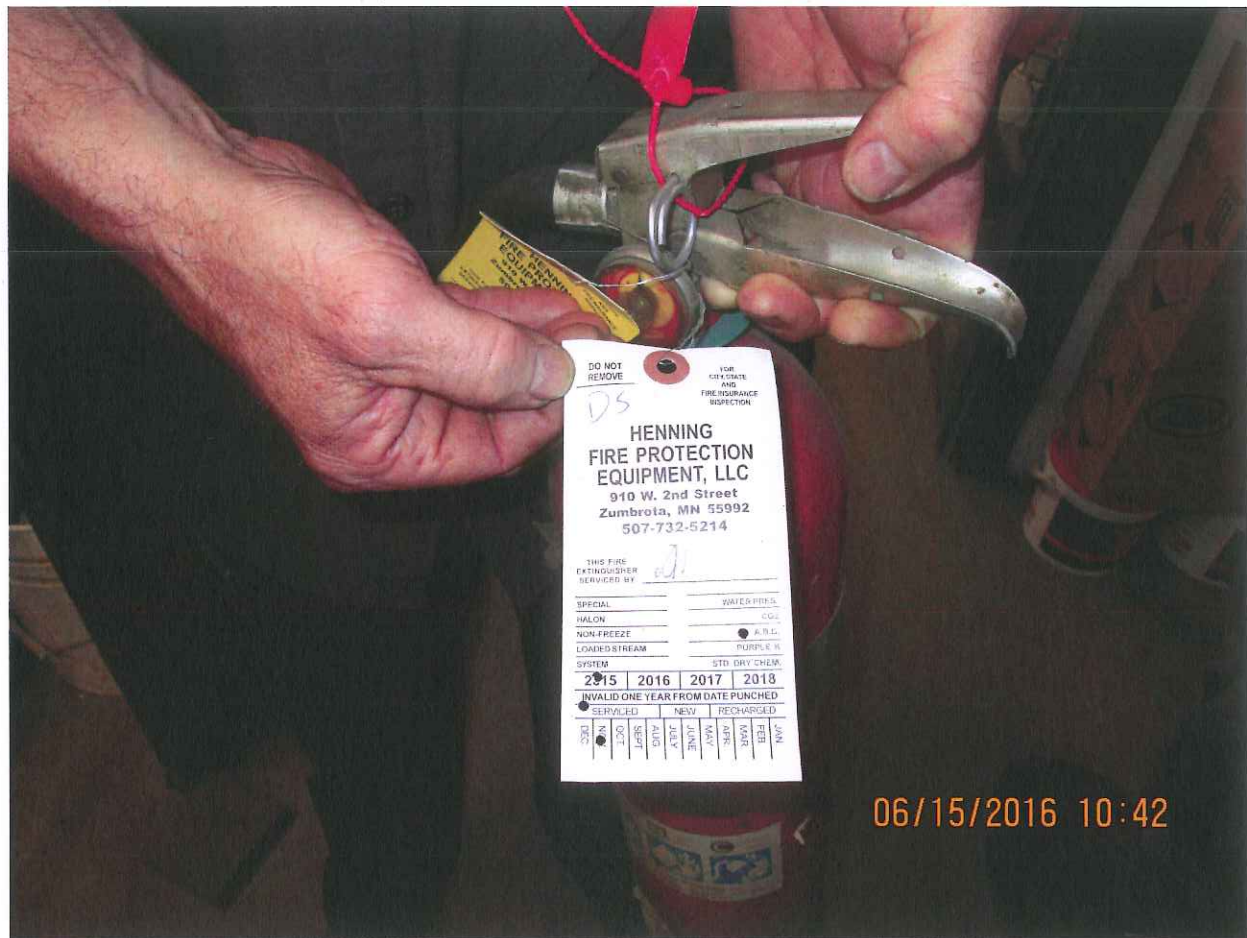


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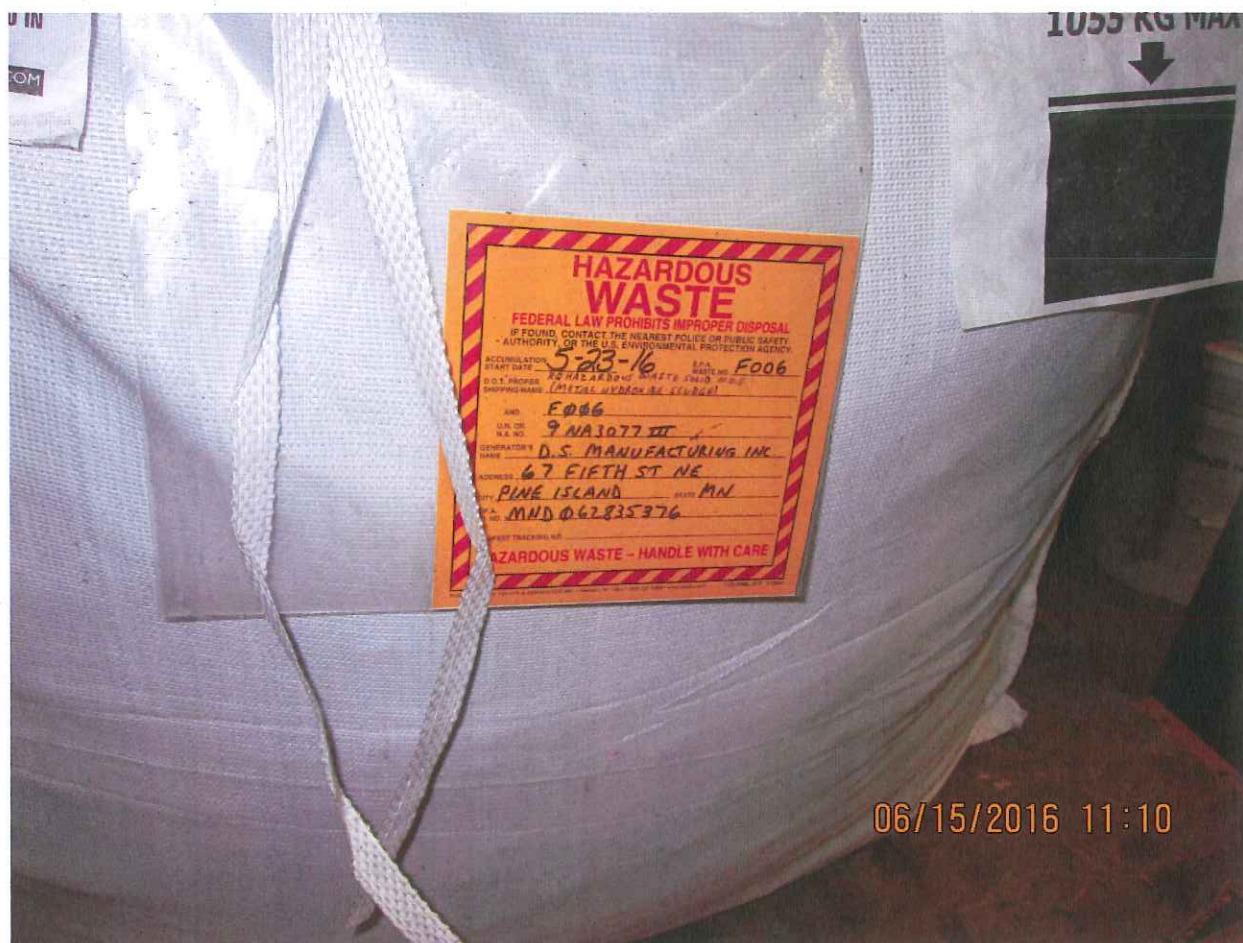


PHOTOGRAPH 19: DS Manufacturing MND 062 835 376





PHOTOGRAPH 19: DS Manufacturing MND 062 835 376





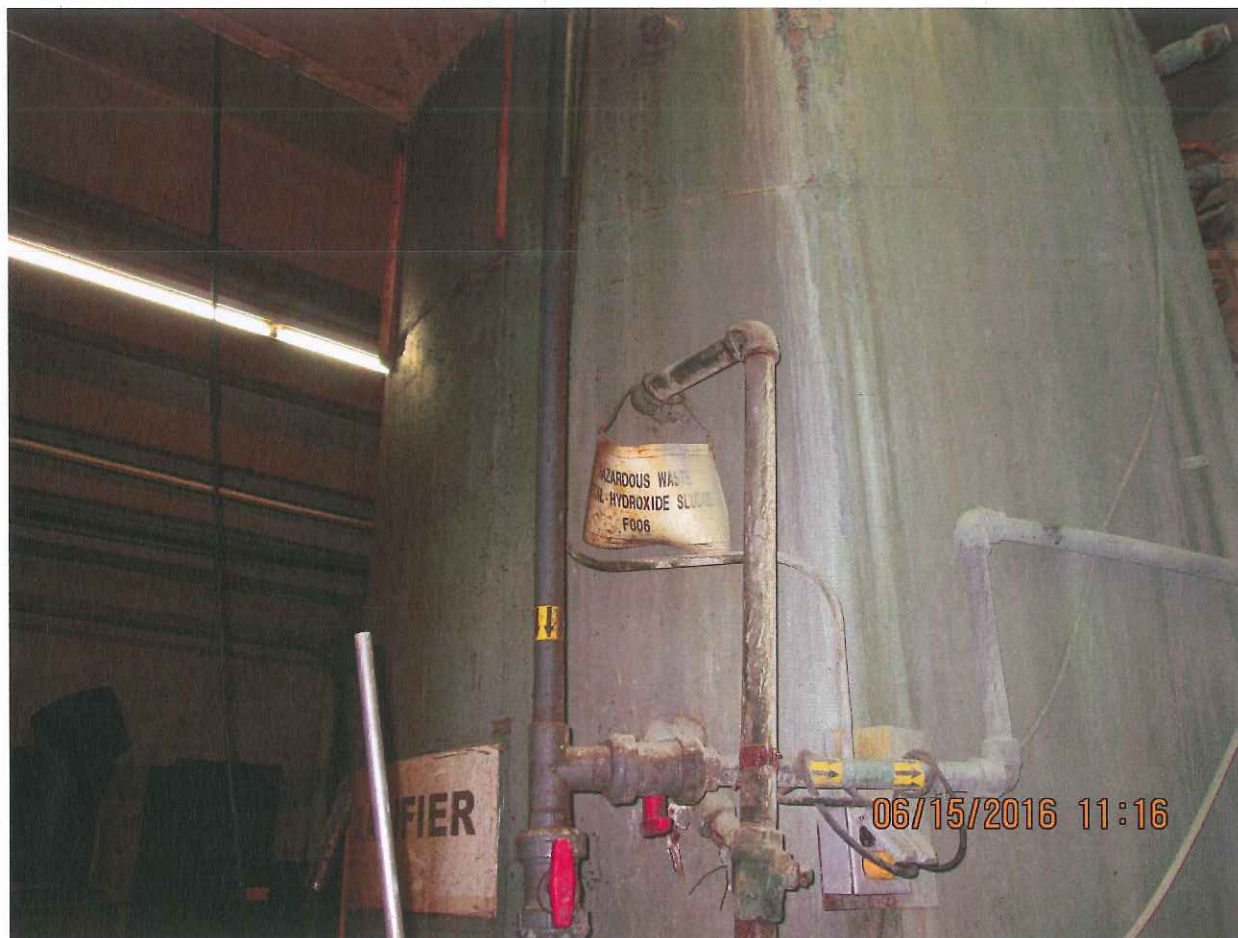


PHOTOGRAPH 19: DS Manufacturing MND 062 835 376





PHOTOGRAPH 19: DS Manufacturing MND 062 835 376





PHOTOGRAPH 19: DS Manufacturing MND 062 835 376







PHOTOGRAPH 19: DS Manufacturing MND 062 835 376

**WASTE**

**FEDERAL LAW PROHIBITS IMPROPER DISPOSAL**  
IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY  
AUTHORITY, OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY.

ACCUMULATION START DATE \_\_\_\_\_ E.P.A. WASTE NO. F006

D.O.T. PROPER SHIPPING NAME Ignitable Corrosive Liquid

AND F004

U.N. OR N.A. NO. 1330

GENERATOR'S NAME DS Manufacturing Inc.

ADDRESS 244 E. 4th St. NE

CITY Prosser GA STATE GA

E.P.A. ID. NO. MND 062 835 376

MANIFEST TRACKING \_\_\_\_\_

06/15/2016 11:17

**HAZARDOUS WASTE - HANDLE WITH CARE**

